

YOUNG, SHERON

From: _Regulatory Comments
Sent: Monday, July 17, 2006 8:08 AM
To: YOUNG, SHERON
Subject: FW: Jim Lumpkin Comments on proposed Rule Part 740

From: Jim Lumpkin [mailto:JIM@usacu.org]
Sent: Friday, July 14, 2006 1:04 PM
To: _Regulatory Comments
Subject: Jim Lumpkin Comments on proposed Rule Part 740

Good Morning/Afternoon:

I would like to comment on your implementation time line for use of the new NCUA official sign in printed documents. According to the proposed rule, credit unions would have 60 days after receiving the signs from NCUA to come into compliance. While I believe this would be an appropriate time line for web sites, teller windows, print advertisements, etc., I do not believe the 60 day time line is appropriate for printed disclosures, marketing brochures, etc. In order to achieve some cost efficiencies, we purchase/print our disclosures, brochures, new member packets, etc. in sufficient quantities to provide a 6 months supply. Your proposed time line would require us to dispose of thousands of dollars worth of new member packets and other brochures which contain the older NCUA sign. I would suggest that a 6 month time period would be more appropriate for compliance with the new sign requirements for printed materials.

Thank you for your consideration.

Jim Lumpkin
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